

JS 44 (Rev. 06/17)

WB**CIVIL COVER SHEET**

2:18-1249

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

SALIMA CUNNINGHAM

(b) County of Residence of First Listed Plaintiff **PHILADELPHIA**
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

REGINALD ALLEN, ESQUIRE, 7601 CRITTENDEN STREET, F12
PHILADELPHIA, PA 19118

DEFENDANTS

ACCENUTURE

18

1249

County of Residence of First Listed Defendant **COOK**
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|-------------------------------------|--------------------------|---|--------------------------|-------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 Incorporated or Principal Place of Business In This State | <input type="checkbox"/> | <input type="checkbox"/> |
| Citizen of Another State | <input type="checkbox"/> | <input type="checkbox"/> | 2 Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> | <input type="checkbox"/> | 3 Foreign Nation | <input type="checkbox"/> | <input type="checkbox"/> |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input checked="" type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 424 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 425 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 426 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 427 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 428 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 429 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 430 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 431 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 432 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 433 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 434 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 435 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 436 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 437 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 438 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 439 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 440 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 441 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 442 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 443 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 444 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 445 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 446 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 447 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 448 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 449 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 450 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 451 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 452 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 453 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 454 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 455 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 456 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 457 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 458 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 459 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 460 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 461 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 462 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 463 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 464 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 465 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 466 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 467 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 468 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 469 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 470 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 471 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 472 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 473 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 474 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 475 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 476 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 477 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 478 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 479 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 480 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 481 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 482 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 483 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 484 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 485 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 486 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 487 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 488 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 489 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 490 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 491 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 492 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 493 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 494 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 495 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 496 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 497 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 498 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 499 Habeas Corpus 28 USC 1254 <input type="checkbox"/> 500 Habeas Corpus 28 USC 1254	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. SECTION 1983

Brief description of cause:
EMPLOYMENT DISCRIMINATION

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
151,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

MAR 26 2018

MAG. JUDGE

WB

UNITED STATES DISTRICT COURT

18

1249

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 5106 Parkside Avenue, Fl. 1, White, PA 19131Address of Defendant: 161 North Clark Street, Chicago, ILL 60601Place of Accident, Incident or Transaction: Chicago ILL + King of Prussia, PA.
(Use Reverse Side For Additional Space)Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases

11. ☒ All other Federal Question Cases(Please specify) Employment Discrimination

B. Diversity Jurisdiction Cases:

1. ☒ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☒ All other Diversity Cases

(Please specify) Employment Discrimination

ARBITRATION CERTIFICATION

(Check Appropriate Category)

1. Reginald Allen, Esq. counsel of record do hereby certify:
☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$50,000.00 exclusive of interest and costs;
☐ Relief other than monetary damages is sought.

DATE: 3/26/2018Reginald Allen
Attorney-at-Law77083
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 3/26/2018Reginald Allen
Attorney-at-Law77083
Attorney I.D.#

MAR 26 2018

WB**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA****CASE MANAGEMENT TRACK DESIGNATION FORM***Salima Cunningham*

v.

Accenture, et al.

CIVIL ACTION

18 1249

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

3/26/2018
DateReginald Allen
Attorney-at-lawSalima Cunningham
Attorney for(215) 242-3875
Telephone(267) 323-2037
FAX Numberreginald.allen08@comcast.net
E-Mail Address

(Civ. 660) 10/02

MAR 26 2018

\$400

WB

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

SALIMA CUNNINGHAM
5106 PARKSIDE AVENUE, FLOOR 1
PHILADELPHIA, PA 19131

PLAINTIFF,

V.

ACCENTURE LLP
161 NORTH CLARK STREET
CHICAGO, IL 60601

AND

PROCURIAN
1001 STATE STREET, SUITE 1440
ERIE, PA 16501

DEFENDANTS.

: CIVIL ACTION NO.

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: JURY TRIAL DEMANDED

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COMPLAINT IN CIVIL ACTION

JURISDICTION

1. This action is brought pursuant to 42 U.S.C. S 1981. Jurisdiction is based on 28 U.S.C S 1331 AND 1343. Jurisdiction is also based on diversity on citizenship pursuant to 28 U.S.C. s 1332; damages recoverable exceed the sum of \$75, 000.00 (seventy five thousand dollars and zero cents), exclusive of interest and costs.

PARTIES

2. Plaintiff is an adult citizen and resident of Philadelphia, PA, who has an address as indicated in the caption above.
3. Defendant Accenture is a business entity, located in Illinois and has an address as indicated in the caption above; defendant also has locations around the county, including in King of Prussia, PA, and it does substantial business in the Commonwealth of Pennsylvania.
4. Defendant, Procurian is a business entity, which has or had one of its business addresses as indicated in the caption above; defendant had locations around the county, including in King of Prussia, PA and it did substantial business in the Commonwealth of Pennsylvania, at times relevant to this complaint.

FACTUAL ALLEGATIONS

5. Plaintiff is African-American, Black.
6. Plaintiff became employed with defendant "Procurian in December 2013 – defendant; reportedly, Accenture purchased defendant Procurian as of around March 1, 2014; plaintiff's position was "procurement representative".

7. Plaintiff performed her abilities in no less than a satisfactory manner at all times relevant to her claims in this complaint, and she was qualified for her position.
8. Plaintiff worked at defendants' location in King of Prussia, PA.
9. From around the beginning of plaintiff's employment until it was abruptly terminated on/around April 4, 2014, plaintiff was subjected to differential treatment and worse treatment than her similarly situated Caucasian peers, and other employees who were not in her protected classes, including but not limited to the following conduct:
 - a. False criticisms of her work by defendants' managers and supervisors, and unwarranted false negative appraisals of her performance;
 - b. Intentional denial of necessary training to perform all aspects of her job;
 - c. Not being given comparable "hands on" training that her similarly situated personnel received, based on her race – subtle ostracizing;
 - d. Not being allowed benefits and perks such as being allowed to work from home during snow storms and being required to use her leave on such occasions when she was physically incapable of making it to work due to the weather;

- e. Not being allowed to borrow an office computer to work from home;
- f. Being subjected to unwarranted hostility in the form of profanity from her supervisor/manager, including the “F” word, while similarly situated Caucasian personnel enjoyed a warm and friendly relationship with the same supervisor/manager;
- g. Being ridiculed and chastised about her race, and being referred to as if she was a rapper based on her race, by her supervisor/manager, who referred to her, as “Salima C”;
- h. Being falsely accused of not dressing appropriately and professionally;
- i. Not being given proper credit for exceeding her quotas;
- j. Being treated inappropriately by her supervisor based on negative stereotyping for African-American and Black women, with inappropriate remarks and leering pertaining to her body shape;
- k. Being fired for alleged low productivity, when some of her similarly situated Caucasian peers or other peers not in her protected class, were not fired, but who were less productive than she was;
- l. One of plaintiff’s Caucasian co-workers mocked African-Americans and Blacks by appearing on the internet in “Black face”, acting in a derogatory

manner and as negative stereotype of African-Americans and Blacks, displaying what appear to be mock gang signs, making reference to looking like “Will Smith”, and questioning about being kissed by a “white woman” – upon information and belief, this posting was shared throughout the workplace and defendants’ management is aware of it, and took no corrective action.

10. Plaintiff was fired on a false basis, and because she is African-American and Black.

11. As a result of defendants’ conduct described above, plaintiff suffered economic loss and she also suffered severe emotional distress.

FIRST CAUSE OF ACTION –DISCRIMINATION BASED ON RACE IN VIOLATION
OF 42 U.S.C SECTION 1981 AS TO ALL DEFENDANTS

12. Plaintiff incorporates paragraphs 1-11 above as though fully set forth herein.

13. Plaintiff was harassed and eventually terminated from her employment based on her race.

WHEREFORE, plaintiff respectfully requests judgment in her favor against defendants, jointly and severally and she requests the following relief:

- a. Back pay;
- b. Front pay;
- c. Compensatory damages;
- d. Punitive damages;
- e. Reasonable Attorney's Fees and Costs;
- f. Any Other Relief the Court Deems Appropriate.

**SECOND CAUSE OF ACTION – HOSTILE WORK ENVIRONMENT BASED ON RACE IN
VIOLATION OF 42 U.S.C. SECTION 1981 AS TO ALL DEFENDANTS**

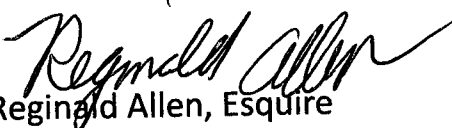
- 14. Plaintiff incorporates paragraphs 1-13 above as though fully set forth above.
- 15. Defendants' conduct described above, particularly in paragraph 9, occurred on an ongoing daily basis, including evidenced racial hostility.
- 16. Plaintiff's terms and conditions of employment were negatively affected by defendants' conduct and treatment, and plaintiff suffered extreme emotional distress from such conduct, which a reasonable person in plaintiff's shoes would also have been severely negatively impacted by.
- 17. Some of the conduct, including degrading conduct, was done by defendants' managerial employees, and other of it was endorsed and

condoned by their management.

WHEREFORE, plaintiff requests judgment in her judgment in her favor jointly and severally and she requests the following relief:

- a. Compensatory damages;
- b. Punitive damages;
- c. Reasonable Attorney's Fees and Costs;
- d. Any Other Relief the Court Deems Appropriate.

Respectfully submitted,


Reginald Allen, Esquire